

U.S. Department of Justice

United States Attorney Eastern District of New York

CRH/MAA/IC F. #2017R00906 271 Cadman Plaza East Brooklyn, New York 11201

May 2, 2023

By ECF and E-mail

Lawrence S. Lustberg Genna A. Conti Gibbons, P.C. One Gateway Center Newark, NJ 07102 973-596-4500 llustberg@gibbonslaw.com gconti@gibbonslaw.com Kevin K. Tung Kevin Kerveng Tung P.C. 136-20 38th Ave., Ste. 3D Flushing, NY 11354 718-939-4633 ktung@kktlawfirm.com Renee M. Wong 401 Broadway Suite 306 New York, NY 10013 917-701-0792 renee@wonglaw.net

Re: United States v. Hu Ji, et al.

Criminal Docket No. 21-265 (S-1) (PKC)

Dear Counsel:

cc:

On May 2, 2023, the government electronically shared, via USAfx, its initial disclosures pursuant to 18 U.S.C. § 3500 and Rule 26.2 of the Federal Rules of Criminal Procedure ("3500 material") in connection with the upcoming trial in the above-referenced case, scheduled to commence on May 30, 2023.

The government does not concede the relevance, materiality or admissibility of the information disclosed herein. If the government becomes aware of any additional 3500 or Rule 16 material, the government will provide it to you as it becomes available. The government continues to request reciprocal discovery from the defendants.

Respectfully submitted,

BREON PEACE United States Attorney

By: /s/

Craig R. Heeren Meredith A. Arfa Irisa Chen

Assistant U.S. Attorneys

(718) 254-7000

Clerk of the Court (PKC) (by ECF) (without enclosures)